

1 KIMBERLY P. STEIN, ESQ.
2 Nevada Bar No. 8675
3 kps@fdlawlv.com
4 FLANGAS DALACAS LAW GROUP
5 3275 South Jones Boulevard, Suite 105
6 Las Vegas, NV 89146
7 Telephone: (702) 307-9500
8 *Attorneys for Plaintiff/Counterclaim Defendant Tsai-Lu Shen*

9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12
13 TSAI-LU SHEN, an individual,
14 Plaintiff,
15 v.
16 MICHELLE LACOUR, an individual; DOES I-
17 X, inclusive; and ROE CORPORATIONS I-X,
18 inclusive,
19 Defendants.

20 Case No: 2:19-CV-01564-JAD-VCF
21 **STIPULATION AND ORDER
22 TO STAY MATTER
(ECF NO. 79 AND ECF. NO 109;
23 and ECF NO. 103 AND 104)**

24
25 MICHELLE LACOUR,
26 Counterclaimant,
27 v.

28 TSAI-LU SHEN,
29 Counterclaim
30 Defendant,

31
32 MICHELLE LACOUR,
33 Third-Party Plaintiff,
34 v.

35 JAYSON BAYBUTT and PUBCO
36 REPORTING SOLUTIONS, INC.,
37 Third-Party Defendants.

38
39 Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen's,
40 ("Shen"), Defendant/Counterclaimant Michelle LaCour's ("Defendant" or "LaCour"), and
41 Third-Party Defendants Jason Baybutt and Pubco Reporting Solutions (collectively, "Third
42

1 Party Defendants") by and through their counsel of record, hereby stipulate and agree as
2 follows:

- 3 1. That the parties are engaged in settlement negotiations to resolve the above-
4 captioned matter and believe it would promote settlement for the matter to be
5 stayed sixty (60) days to allow for completion of the settlement terms and at
6 that time it is anticipated the parties will submit a Stipulation and Order to
7 Dismiss.
- 8 2. Currently, Plaintiff's deadline to file his response to the remaining
9 Counterclaims is March 16, 2021. Third-Party Defendants' responsive pleading
10 is due April 15, 2021, and thereafter it was anticipated that a new 26(f)
11 conference would occur and thereafter a new Joint Stipulated Discovery Plan
12 and Scheduling Order would be submitted based on the addition of the new
13 parties.
- 14 3. There is currently no trial or hearings scheduled in this matter.

15 Respectfully submitted by:

16 Dated: March 15, 2021

17 /s/ Kimberly P. Stein

18 KIMBERLY P. STEIN, ESQ.
19 Nevada Bar No. 8675
20 FLANGAS DALACAS LAW GROUP
21 3275 S. Jones Blvd., Suite 105
22 Las Vegas, NV 89146
23 *Attorneys for Plaintiff/Counterclaim
Defendant Tsai-Lu Shen*

24 Dated: March 15, 2021

25 /s/John H. Jamnback

26 JOHN K. GALLAGHER ESQ.
27 Nevada Bar No. 956
S. TIMOTHY SUMMERS, ESQ.
Nevada Bar No. 12285
PATRICK H. GALLAGHER, ESQ.
Nevada Bar No. 14875
GUILD, GALLAGHER, FULLER, LTD.
100 W. Liberty St., Ste. 800
Reno, Nevada 89501
JOHN H. JAMNBACK, ESQ.
Washington State Bar No. 29872
(*pro hac vice approved*)
YARMUTH LLP
1420 Fifth Ave., Suite 1400
Seattle, WA 98101
Attorneys for Defendant Michelle LaCour

1 Dated: March 15, 2021

2 /s/Michael E. Sullivan

3 MICHAEL E. SULLIVAN, ESQ.

4 Nevada Bar No. 5412

5 ROBISON, SHARP, SULLIVAN & BRUST

6 71 Washington Street

7 Reno, NV 89503

8 WRIGHT NOEL, ESQ.

9 Washington State Bar No. 25264

10 (pro hac vice approved)

11 CARSON-NOEL PLLC

12 20 Sixth Avenue, NE

13 Issaquah, WA 98027

14 *Attorneys for Third Party Defendants*

15 *Jason Baybutt and Pubco Reporting Solutions*

16 **ORDER**

17 **IT IS HEREBY ORDERED** that this matter is stayed for sixty (60) days and that
18 all current deadlines are extended until expiration of the stay.

19 Dated this 18th day of March, 2021.

20 
21 **UNITED STATES MAGISTRATE JUDGE**